



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

999 18TH STREET- SUITE 300

DENVER, CO 80202-2466

Phone 800-227-8917

<http://www.epa.gov/region08>

SDMS Document ID



2031088

Mr. Dan Thede
City Manager, City of Libby
952 E Spruce Street
Libby, Montana 59923

Dear Mr. Thede,

I would like to inform you that the Environmental Protection Agency (EPA) will be conducting soil sampling in preparation for the City of Libby's (City) public works project in the Johnson Acres section of Libby, MT. This sampling event is intended to screen for large areas of contaminated soil and to provide some limited information on the amount of work that may be required of EPA. It may also provide information that can help your contractors plan their work approach. The sampling is not intended in any way to fully characterize the area, or to alleviate the need for caution while performing the soil excavation for the project. Regardless of what our sampling shows, the City's contractor(s) will still need to have someone on site at all times, while excavation is in progress, that has been trained to recognize both vermiculite contaminated soil and mine tailings. All of the discussions that you and your contractors have had with EPA and our representatives are still applicable.

In the event that contaminated soil is encountered or suspected, EPA expects that the City's contractors will immediately contact EPA. We will evaluate the situation with you and develop a course of action. If the contractors have encountered highly contaminated soil, EPA expects that work will stop until appropriate measures have been taken. We highly recommend that your contractors be prepared to move to another area of work if this occurs. If smaller, isolated areas of significant contamination are found, we should be able to take action relatively quickly, though we will not be able to drop everything and respond immediately. The decisions regarding how quickly we can respond, and how much work is required, will be made "on the fly" by the EPA representative in Libby (probably myself) on a case by case basis. On the other hand, if it becomes apparent to us that the contamination is more widely spread, we remind you that EPA does not have the resources to excavate a large portion of the job. If this should happen, all parties involved will need to take a step back and re-evaluate their approach to this project.

As with all environmental cleanups, there will likely be grey areas where the soil is only slightly contaminated and not dirty enough to stop work or to trigger EPA action. Hopefully, if contamination is encountered during the course of excavations, it will fall mostly in this category. In these instances, work should be able to proceed with little impact, but we would still like to work with the City and their contractors to ensure we are protecting both the workers and the public. I look forward to working with the City on this project.

Sincerely,

Craig Myers
Federal On Scene Coordinator
U.S. Environmental Protection Agency (Region 8)
999 18th Street Suite 300
Denver, Co 80202
(303) 312-7067

Cc: Jim Christiansen, EPA
Courtney Zamora, DOT Volpe Center
Catherine Lecours, MDEQ